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Attorneys for Defendants, COUNTY OF
LOS ANGELES and CARLOS MACIEL

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ALEXIS CERNAS, JOHN I.C. DOE, a
minor, by and through his guardian ad
litem Maritza Casillas; JANE I.C. DOE,
and, a minor, by and through her
guardian ad litem Maritza Casillas; and
BEATRIZ LOERA,

Plaintiffs,

v.

COUNTY OF LOS ANGELES,
CARLOS MACIEL, and DOES 1
through 10, inclusive,

Defendants.

Case No. 2:24-cv-03261-SPG-SK
District Judge, Sherilyn Peace Garnett
Magistrate Judge, Steve Kim

**STIPULATION AND JOINT
REQUEST FOR CONTINUANCE
OF COURT'S DEADLINES RE
MOTIONS FOR SUMMARY
JUDGMENT**

Proposed Order filed Concurrently

Filed Date: 04/19/24
Trial Date: 01/27/26

TO THE HONORABLE COURT

Defendants County of Los Angeles and Detective Carlos Maciel, and Plaintiffs
Alexis Cernas, John I.C. Doe – by and through his guardian ad litem Maritza Casillas,
Jane I.C. Doe – by and through her guardian ad litem Maritza Casillas, and Beatriz
Loera (the Parties), stipulate and submit their joint request for a short continuance of
the Court's deadlines regarding the preparation and filing of motions for summary
judgment based on the following good cause.

GOOD CAUSE STATEMENT:

1. The parties participated in a mediation with ADR Panel Mediator, Richard Copeland on August 1, 2025. At that time, the parties reached a potential settlement agreement, contingent on the approval of the settlement by the County's Contract Cities Claims Board, plaintiffs' execution of a release of claims, and the Court's approval of a minors' compromise.
2. Because of this, the parties believe that a short continuance of the Court's deadlines regarding meet and confer, preparation of the joint brief re motion for summary judgment, final preparation and filing, and hearing of dispositive motions is warranted.
3. To avoid wasting valuable time and resources of the Court, counsel for the parties respectfully request that the Court continue the current scheduling deadlines regarding motions for summary judgment along the following lines:

<i>Case Management Event:</i>	<i>Prior-Operative Date-Deadline:</i>	<i>NEW Date-Deadline:</i>
Pre-filing Meet and Confer	August 8, 2025	August 22, 2025
Defendants' Portion of Joint Brief to Plaintiffs	August 22, 2025	August 29, 2025
Plaintiffs' Portion of Joint Brief to Defendants	September 5, 2025	September 12, 2025
MSJ Filing	September 9, 2025	September 17, 2025
MSJ Hearing	October 8, 2025	October 15, 2025

4. It is anticipated that the settlement will be presented to the County's Contract Cities Claims Board for consideration on August 13, 2025.
5. If the matter should resolve, alleviating the need for further litigation, the parties will file a status report, apprising the Court of such development.

1 Respectfully submitted,

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3 DATED: August 6, 2025

LAW OFFICES OF DALE K. GALIPO

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By /s/ Renee Masongsong

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Dale K. Galipo
Renee Masongsong
Attorneys for Plaintiffs

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10 DATED: August 6, 2025

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

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Bv /s/ Lynn Carpenter

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Eugene P. Ramirez
Lynn Carpenter
Attorneys for Defendants COUNTY OF
LOS ANGELES, et al.

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